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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,
Plaintiff,
vs.
RIOT GAMES, INC.,
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

[FILED UNDER SEAL]

PLAINTIFF'S NOTICE OF RECEIPT OF
ANONYMOUS TIP; MOTION FOR IN
CAMERA REVIEW AND REQUEST FOR
PROTECTIVE ACTION

Dated this: May13, 2025

M. Wolstenholme.

[MARC WOLSTENHOLME]

[FILED UNDER SEAL]

Sensitive, Criminal and Urgent

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SUPPLEMENT TO PLAINTIFF'S MOTION TO ENFORCE COURT ORDERS, COMPEL DISCOVERY, AND
REQUEST HEIGHTENED DISCOVERY ENFORCEMENT

I. SEALED NOTICE AND MOTION FOR IN CAMERA REVIEW

To the Honorable Court, and to the Honorable Judge Fernando M. Olguin:

Plaintiff respectfully submits this sealed notice and motion requesting an in camera review of a serious and highly sensitive anonymous communication received on May 13, 2025 at 00:01 UTC, via ProtonMail from the address arcanecase@proton.me. The message contains:

Allegations of fabrication of legal evidence;

Allegations of destruction of digital records;

Allegations of use of falsified emails as future litigation exhibits;

Cloaked warnings of harm and implications of retaliatory action;

Identification of a third-party data company allegedly involved in sanitizing evidence.

This message is both disturbing and detailed, referencing individuals and timelines directly tied to this litigation.

1 **II. Not the Usual Ongoing Harassment**

2 This communication does not read nor follow the structure, tone, or intent of the
3 harassing and abusive hate mail Plaintiff has received throughout these proceedings. Unlike the
4 crude, threatening form submissions from anonymous trolls, this message was sent directly to
5 Plaintiff's private email address, via a secure and sophisticated channel (ProtonMail), and
6 contains substantive, case-specific intelligence.
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9 It reflects:

10 A well-developed knowledge of the case record;

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12 Awareness of Plaintiff's past procedural steps;

13 Reference to Defendant's submission of misleading Riot Forge material, which
14 Plaintiff has previously challenged;
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17 Detailed insight into internal communications, dates, document formats, and data
18 handling processes allegedly used by Riot Games and Chronodisk.
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21 The credibility of the communication is further reinforced by website activity
22 analytics on May 12, 2025, showing targeted international traffic from regions tied to Fortiche,
23 Tencent, and Chronodisk.
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1 **III. SUBSTANCE OF THE TIP**

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3 The anonymous message alleges that a company called Chronodisk was engaged

4 by associates of the Defendants to "scrub" computer systems at Fortiche's Paris-based

5 headquarters during February 2025. The sender states that the relevant devices have since been

6 relocated to Fortiche's Spanish division in Las Palmas.

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9 The email further alleges that fabricated internal emails dated August 2018,

10 January 2019, and potentially mid-2019, supposedly between Christian "Praeco" Linke, Alex

11 Yee, and Jane Hoffacker, will be presented by Defendants as authentic proof of independent

12 development of Arcane. These documents are alleged to include:

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15 Season 1 "final" scripts;

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18 Season 2 early drafts;

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20 Accompanying concept art;

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22 Communications prepared specifically to create false timelines.

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IV. ABOUT CHRONODISK

Chronodisk is a verified digital recovery and data forensics company with:

A laboratory and clean room in central Paris;

A second site in Montreal, Canada (841 Cherrier Street, Montreal, QC).

Chronodisk's operations and credibility add significant weight to the assertion that Fortiche's systems may have been systematically wiped or altered.

V. SUSPICIOUS WEBSITE ACTIVITY (PRE-EMAIL)

On May 12, 2025, hours before receiving the anonymous message, Plaintiff's website experienced a sharp surge in traffic from IP addresses in regions associated with Riot, Tencent, Fortiche, and Chronodisk. These included:

Paris, France (Fortiche HQ and Chronodisk);

Montpellier, France (Fortiche);

Hong Kong & Singapore (Tencent regional offices);

Shenzhen, China (Tencent HQ);

Montreal, Canada, with a visitor logged within 1.4 km of Tencent and 3 km of Chronodisk;

London, UK (Hendon, Barnet), a recurring location appearing after major case events.

This traffic strongly correlates with strategic surveillance and adds circumstantial credibility to the email's origin and intent.

1 **VI. HEALTH AND SAFETY IMPACTS**

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3 Plaintiff is currently bedridden with labyrinthitis, a severe inner ear condition
4 causing constant vertigo. Plaintiff also suffers from complex PTSD and other chronic injuries,
5 exacerbated by litigation stress and threats.
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8 The email’s references to “containment” and “consequences” read as veiled death
9 threats, deeply affecting Plaintiff’s mental and physical wellbeing.
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12 **VII. ATTACHED UNDER SEAL:**

13 Exhibit A- Arcane Case- PDF copy of the anonymous email, Message ID, and
14 metadata. Full header metadata confirming delivery via ProtonMail’s Swiss server (IP:
15 79.135.106.97);
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18 Exhibit B-Unusual website activity on the 12.05.2025 from France, Honk Kong,
19 China and Montreal- Website traffic logs (pre-email spike).
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21 Exhibit C- Report for Authorities – Anonymous Insider Tip Regarding Alleged
22 Evidence Tampering in Federal Litigation-
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25 Exhibit D- Screenshots of the message in Plaintiff’s inbox.
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VIII. **REQUEST FOR JUDICIAL REVIEW AND PROTECTIVE ACTION**

Plaintiff respectfully requests:

The court initiate criminal investigations and proceedings with appropriate agencies.

That this filing and its attachments remain under seal;

That the Court conduct an in camera review of the anonymous message and associated material;

That the Court consider issuing a preservation order to ProtonMail, Fortiche France, and Fortiche Spain, and Tencent Montreal, and perhaps Chronodisk in both Paris and Montreal for all records related to:

The alleged internal emails;

Communications between named parties;

Any system activity logs for the months of August 2018 to July 2019;

Records of any use of Chronodisk or any other data recovery wiping companies.

That Riot Games not be granted access to this filing or its content unless the Court determines disclosure is appropriate;

That the Court consider scheduling a private hearing or telephonic conference with the Plaintiff to discuss this matter in confidence.

That the Court reviews the patterns of corrupt and alarming behaviors of Riot Games and its legal team in these matters, which the Plaintiff has been documenting.

IX. REASONS FOR SEALING

Plaintiff respectfully submits that good cause exists for the Court to seal this filing and all associated exhibits pursuant to Local Rule 79-5.1 and Federal Rule of Civil Procedure 26(c):

The filing includes highly sensitive and nonpublic information relating to a whistleblower-style disclosure that, if accurate, could implicate criminal activity including fabrication of evidence and spoliation. The Plaintiff has already shown that the Riot Forge submission portal document presented, under ambush during the settlement conference, by Riot Games as evidence was manipulated and misrepresented as evidence.

The communication contains cloaked and veiled threats suggesting a broader campaign of intimidation and suppression, posing a credible and ongoing threat to Plaintiff's physical and psychological safety.

The tip was delivered through ProtonMail, a secure encrypted Swiss-based platform, which strongly indicates the sender intended for the message to remain confidential and protected from adversarial access.

Disclosure to Defendants at this stage could compromise potential investigations, allow preemptive destruction of records, or intimidate others with knowledge of the misconduct.

1 Plaintiff has been subject to escalating and coordinated harassment and is
2 currently managing serious medical conditions including labyrinthitis and complex PTSD,
3 conditions exacerbated by ongoing litigation pressure and threats.
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6 Critically, if this filing remains sealed and Defendants subsequently take any of
7 the exact actions warned of in the anonymous message or present the evidence with correct dates
8 and manipulated content, including submission of the alleged emails or failure to produce
9 systems for forensic review, this sealed document becomes direct proof of criminal intent,
10 premeditated spoliation of evidence, and potential fraud upon the Court.
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13 Accordingly, Plaintiff seeks protection of the content, attachments, and associated
14 metadata under seal to allow the Court to evaluate the materials in camera.
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X. LEGAL AUTHORITY

This motion is grounded in the Court’s inherent powers and the following authorities:

Fed. R. Civ. P. 26(c) — permitting protective orders to protect a party from “annoyance, embarrassment, oppression, or undue burden or expense.”

Chambers v. NASCO, Inc., 501 U.S. 32, 43–46 (1991) — reaffirming the Court’s inherent power to manage its own proceedings and protect the integrity of litigation.

Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1178 (9th Cir. 2006) — sealing permitted for documents where “compelling reasons” exist, including when disclosure could be used “as sources of business information that might harm a litigant’s competitive standing.”

Foltz v. State Farm Mut. Auto Ins. Co., 331 F.3d 1122, 1135 (9th Cir. 2003) — recognizing courts’ ability to manage sensitive discovery material that could compromise litigation fairness.

C.D. Cal. L.R. 79-5 — establishing procedural guidelines for filing sealed materials in civil matters.

These authorities justify both the request for sealed status and the limited in camera review requested herein.

XI. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court:

Accept this submission and its exhibits under seal;

Conduct an in camera review of the anonymous email and its supporting context;

Preserve the sealed status unless and until the Court deems disclosure appropriate;

Consider scheduling a private or telephonic hearing to address the matter

confidentially;

Issue any necessary preservation orders to prevent the destruction or manipulation
of relevant evidence by the parties identified;

Recognize that this message, if corroborated by subsequent events or disclosures
by Defendants, may serve as direct evidentiary proof of intentional misconduct, spoliation, and
fraud upon the Court.

Consider what protection and other agencies may need to be involved in
proceedings.

The Plaintiff submits this motion with great urgency and in good faith, for the
protection of the judicial process, the integrity of pending proceedings, and personal safety.

XII. Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made
are true and accurate

Executed on May 13, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. Wolstenholme.*

Marc Wolstenholme

Plaintiff in Pro Per

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Coventry, England CV5 7LS

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